

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NICHOLAS MARTIN, on behalf of)	
Himself and other similarly situated)	
Plaintiff,)	1:12-cv-6421
)	Judge Nordberg
v.)	Magistrate Judge Keys
)	
COMCAST CORPORATION,)	JURY TRIAL DEMAND
Defendant.)	

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF

Plaintiff respectfully requests an additional nine days, until April 4, 2014, within which to file his reply in support of his motion for leave to amend the complaint. In support of this motion, plaintiff states:

1. This is a Telephone Consumer Protection Act, 47 U.S.C. §227 et seq. case, which challenges the defendant's telemarketing calls to plaintiff and a class of others who had specifically requested not to be called, and who were on the National Do Not Call Registry. The case also alleges that such calls were impermissible because they were predictive dialer calls made to cell phones.

2. Plaintiff filed a motion for leave to file a First Amended Complaint to conform the pleadings to discovery and alter the class definitions. Comcast has filed an opposition brief, arguing that the amendment should not be allowed. Plaintiff's reply brief is currently due March 26, 2014.

3. Although counsel has attempted to give priority to the completion of this brief, it has not yet been completed. Plaintiff therefore requests an additional nine days, to April 4, 2014, to file the reply brief.

4. Comcast has indicated that it has no objection to this extension.
5. This motion is filed for the reasons herein, and not for purposes of delay or any other improper purpose.

WHEREFORE, plaintiff respectfully requests that this Court extend the time within which plaintiff may file his reply in support of motion for leave to amend, to April 4, 2014.

Respectfully submitted,

/s/Alexander H. Burke

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